



MAR 1 5 2001

Ref. No. 00-0309

400 Seventh Street, S.W. Washington, D.C. 20590

Mr. Bill McDonald Vallen Technical Services 909 William Drive San Lorenzo, CA 94580

Dear Mr. McDonald:

This is in response to your letter requesting clarification under the Hazardous Materials Regulations (HMR;49 CFR Parts 171-180) pertaining to the pressure retest of DOT specification cylinders. Specifically, § 173.34(e)(4)(v)states: "In the case of a malfunction of the test equipment, the test may be repeated at a pressure increased by 10 percent or 100 psi, whichever is less." It is your understanding that only one repeat test is permitted.

Your understanding of this requirement is correct. Section 173.34 (e)(4)(v) permits only one repeat test in the case of a malfunction of the test equipment.

With regards to your reference to the Compressed Gas Association (CGA) Pamphlet C-1, currently the HMR does not incorporate the pamphlet by reference. However, we proposed in a notice of proposed rulemaking to reference certain pressure test procedures contained in the CGA pamphlet. (Docket No. HM-98-3684 (HM-220); October 30, 1998).

I hope this information is helpful. Please contact this office if you need additional assistance.

Sincerely,

Hattie L. Mitchell, Chief

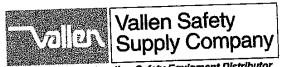
Regulatory Review and Reinvention

the I. Mitchell

Office of Hazardous Materials Standards



173.34



North America's Leading Safety Equipment Distributor

Betts § 173.34(e)(4)(v) Retest 00-0309

11-3-00

Office of Hazardous Materials Standards Director Edward Mazzullo DHM-10 400 7<sup>th</sup> Street, S.W. Washington, DC 20590

Dear Mr. Mazzullo,

Can you please help my department with written clarification regarding the following?

CFR-49, 173.34(e)(4)(v) states that "In the case of a malfunction of the test equipment, the test may be repeated at a pressure increased by 10 percent or 100 psi, whichever is less."

I interpret this as ONE repeat test is permitted.

CGA, C-1, page 4, notes: #3 states that "If repeated, the cumulative increase shall be limited to no more than 10 percent of the minimum prescribed test pressure."

I interpret this to mean that a cylinder with a test pressure of 3700 psi may repeat a test at 3800 psi, again at 3900 psi, and again at 4000 psi without exceeding the cumulative limit of 370 psi thus repeating a test, if necessary, 3 times.

Which is correct?

Thanks for your assistance,

Bill McDonald

Vallen Technical Services

909 William Drive

San Lorenzo, Ca 94580